

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America

v.

#24-CR-03-01/13-SM-AJ

Dennis Drew

MOTION TO WITHDRAW

NOW COMES CJA appointed counsel and seeks to withdraw in the above-captioned matter and have new counsel appointed to represent defendant, Dennis Drew. In support of this, it is alleged as follows:

1. Defense counsel is winding down his law practice after more than 45 years. He plans to retire by fall, but no later than the end of the year. Counsel is of good health.
2. This is a complex case, and it is scheduled for trial at the end of this year. It is unlikely that this case will be concluded by year's end.
3. It would be appropriate to have new counsel get involved with this case now, rather than get involved close to the trial date and perhaps delay this matter. Mr. Drew is in a rehab facility with conditions of release.
4. Counsel has other cases he is appointed to and intends to conclude these cases, as they will conclude within the time frame.
5. The government does not take a position on this motion.

6. Counsel has contacted the defendant and explained to him that counsel is withdrawing and the reasons why.

WHEREFORE, CJA appointed counsel prays for the following relief:

- A. Grant the Motion to Withdraw.
- B. Appoint new counsel to represent the defendant. And,
- B. For whatever other relief the Court deems equitable and just.

Respectfully submitted,

LAW OFFICE OF DONALD A. KENNEDY

Dated: March 22, 2024

By: /s/ Donald A. Kennedy, Esq.
Donald A. Kennedy, Esq. #1351
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603-668-8787

I hereby certify that a copy of the foregoing Motion to Withdraw was this day forwarded electronically to Heather Cherniske, Esquire, Assistant U.S. Attorney.

/s/ Donald A. Kennedy, Esq.
Donald A. Kennedy, Esq.